



**U.S. Department of Justice**

Criminal Division

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Fraud Section

Washington, D.C. 20530

May 8, 2018

**BY ECF**

The Honorable Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Connolly, et al.*, S1 16 CR 370 (CM)

Dear Chief Judge McMahon:

In response to the Court's Order of May 7, 2018 (Docket No. 247) requiring a supplemental declaration from DOJ Trial Attorney Alison Anderson, the government hereby submits for the Court's consideration Government's Exhibit 1A.

By way of explanation, the representation in the taint team's brief (Docket No. 131) that Mr. Prange "asked only a small handful of clarifying questions" at the King proffer was based on a brief conversation Mr. Jackson had with Ms. Anderson about her recollection of the proffer during the brief-writing process. For obvious reasons, neither Ms. Anderson nor anyone else on the trial team reviewed the taint team's brief before it was filed. Ms. Anderson has since clarified—as reflected in her declaration—that her recollection was that Mr. Prange asked *Ms. Saulino* to follow up on a particular line of inquiry; not that Mr. Prange asked any questions directly of Mr. King. The government regrets any confusion that its brief may have inadvertently created on this issue.

Respectfully submitted,

/s/ D. Brittain Shaw  
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CC (via ECF): Counsel for Matthew Connolly and Gavin Black